

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MELISSA MARIE CALDWELL : CHAPTER 13  
Debtor :  
 :  
 :  
 JACK N. ZAHAROPOULOS :  
 STANDING CHAPTER 13 TRUSTEE :  
 Movant :  
 :  
 :  
 vs. :  
 :  
 :  
 MELISSA MARIE CALDWELL :  
 Respondent : CASE NO. 1-24-bk-00927

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 15<sup>th</sup> day of August, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
- a. The plan proposes an unrealistic and speculative step payment, contrary to § 1325(a)(6).
2. The debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9) 2021, 2022, 2023 Federal taxes are not filed.
3. The plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2E and 2G of the plan as to Capital One Bank and Pennsylvania Housing Finance Agency.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder

CERTIFICATE OF SERVICE

AND NOW, this 16th day of August, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire  
135 North George Street  
York, PA 17401

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee